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7 Attorneys for Defendant
FIA CARD SERVICES, N.A.
(erroneously sued as BANK OF
8 AMERICA, a National Association)

9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA
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12 LINDA SINGLEY,
13 Plaintiff,
14 vs.
15 BANK OF AMERICA, a National
16 Association ,
17 Defendant.
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Case No. 14-cv-00525-BEN-NLS

**JOINT MOTION FOR EXTENSION
OF TIME FOR DEFENDANT TO
ANSWER, MOVE, OR OTHERWISE
RESPOND TO PLAINTIFF'S
COMPLAINT**

Compl. Filed: March 7, 2014

Honorable Roger T. Benitez

1 Plaintiff Linda Singley (“Plaintiff”) and Defendant FIA Card Services, N.A.
2 (erroneously sued as BANK OF AMERICA, a National Association)¹ (“Defendant”)
3 by and through their respective counsel of record jointly move for an extension of
4 time for Defendant to answer, move, or otherwise respond to Plaintiff’s Complaint
5 based on the following grounds:

6 WHEREAS, on March 14, 2014, Plaintiff served Defendant with a copy
7 of the summons and Complaint in this action;

8 WHEREAS, pursuant to Federal Rule of Civil Procedure 12, Defendant’s
9 response to Plaintiff’s Complaint is currently due April 4, 2014;

10 WHEREAS, Plaintiff and Defendant have agreed to extend the deadline
11 for Defendant to answer, move, or otherwise respond to the Complaint until April 18,
12 2014 so that Defendant may have the opportunity to fully review and analyze the
13 allegations set forth in the Complaint;

14 WHEREAS, an extension of time until April 18, 2014 for Defendant to
15 answer, move, or otherwise respond to the Complaint will not alter the date of any
16 event or any deadline already fixed by Court order;

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26 ¹ FIA Card Services, N.A., a subsidiary of Bank of America Corporation, is the sole
27 entity that issues and administers “Bank of America” brand credit card accounts.
28 Therefore, Bank of America, a National Association is a wrongly-named defendant.

1 THEREFORE, pursuant to Local Rules 7.2 and 12.1, Plaintiff and Defendant
2 hereby jointly move for an order extending the time for Defendant to answer, move, or
3 otherwise respond to Plaintiff's Complaint until April 18, 2014.

4 DATED: April 3, 2014

REED SMITH LLP

6 By: /s/ Judith T. Sethna

7 Abraham J. Colman (SBN 146933)
8 Judith T. Sethna (SBN 232731)
9 Attorneys for Defendant
10 FIA CARD SERVICES, N.A. (erroneously
11 sued as BANK OF AMERICA, a National
12 Association)

11 DATED: April 3, 2014

HARTMAN LAW OFFICE

12 By: /s/ Jared M. Hartman

13 Jared M. Hartman
14 Attorney for Plaintiff
15 LINDA SINGLEY

16 *I, Judith T. Sethna, hereby certify that the content of this document is*
17 *acceptable to all persons required to sign this document and that I obtained the*
18 *authorizations necessary for the electronic signatures of all parties for this document.*

20 By /s/ Judith T. Sethna